

MEMO ENDORSED**EPSTEIN DRANGEL LLP**

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January 18, 2024

VIA E-MAIL

Hon. Jessica G. L. Clarke
 United States District Judge
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street
 New York, New York 10007

Re: *King Spider LLC v. Putian Chengxiang Cejinsheng Department Store, et al.*
Case No. 23-cv-8782 (JGLC)
Request For Extension of Time to File Motion for Default Judgment

Dear Judge Clarke,

We represent Plaintiff King Spider LLC (“Plaintiff”), in the above-referenced matter (the “Action”).¹ On October 26, 2023, the Court entered an Order directing Plaintiff to file its Motion for Default Judgment by no later than January 22, 2024. (Dkt. 13). For the reasons set forth herein, Plaintiff respectfully requests an extension of time to file its Motion for Default Judgment. In accordance with Your Honor’s Individual Rules of Practice, Plaintiff respectfully submits the following:

1. **Original Date and New Date Requested:** The original deadline for Plaintiff’s Motion for Default Judgment is January 22, 2024. At this time, for the reasons discussed herein, Plaintiff is not requesting a new date to file its Motion for Default Judgment.
2. **The number of previous requests for adjournment or extension:** None, this is the first request for an extension of time to file Plaintiff’s Motion for Default Judgment.
3. **Whether these previous requests were granted or denied:** N/A
4. **The reason for the extension or adjournment:** It has recently come to Plaintiff’s attention that there are at least two (2) additional infringing websites that, upon information and belief, are operated by the Defendants in this Action. Plaintiff’s counsel is currently investigating these infringing websites and intends to move to amend the Complaint to add said related websites to the Action. Therefore, Plaintiff does not believe it proper to move for default judgment at this time. Rather, Plaintiff proposes filing its motion to amend the Complaint by no later than Friday, January 26, 2024.
5. **Whether the adversary consents and, if not, the reasons given by the adversary for refusal to consent:** All of the Defendants remaining in this Action are currently in default, thus Plaintiff did not seek their consent.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaint or Application.

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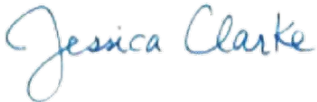
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6. **Proposed alternative dates:** As discussed above, Plaintiff respectfully proposes filing its motion to amend the Complaint by no later than Friday, January 26, 2024.

We thank the Court for its time and attention to this matter.

Application GRANTED. The deadline for Plaintiff to file a motion for default judgment is adjourned *sine die*. Plaintiff's deadline to file an amended Complaint is extended to **January 16, 2024**. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 19.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

January 19, 2024

New York, New York.

Respectfully submitted,

EPSTEIN DRANGEL LLP

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